

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
2000 Biennial Regulatory Review --	)	IB Docket No. 00-248
Streamlining and Other Revisions of Part 25 of	)	
the Commission's Rules Governing the Licensing of,	)	
and Spectrum Usage by, Satellite Network	)	
Earth Stations and Space Stations	)	

**REPLY COMMENTS OF GE AMERICAN COMMUNICATIONS, INC.**

GE American Communications, Inc. ("GE Americom"), by its attorneys, hereby submits its reply to the comments of other parties in response to the *Notice of Proposed Rulemaking* in the above-captioned proceeding, FCC 00-435 (rel. Dec. 14, 2000) (the "*Notice*").

GE Americom is a member of the Satellite Industry Association ("SIA") and fully supports the reply comments being filed by SIA today regarding the issues raised in the *Notice*. GE Americom is filing separately here to emphasize one key issue.

GE Americom strongly believes that an industry working group can best evaluate any needed changes in earth station power level limitations and off-axis angle performance requirements. In its initial comments, GE Americom proposed the formation of such a group to consider these issues. GE Americom Comments at 3-4. Other SIA members agreed that the formation of a working

group to consider technical issues was appropriate,<sup>1</sup> and SIA responded by convening such a group. *See* SIA Reply Comments at Section I. GE Americom is participating actively in these discussions. The group plans to make recommendations regarding a range of technical issues within sixty days. *Id.*

Pending receipt of those recommendations, the Commission should take no action to revise the technical standards relating to earth station licensing. Obviously, an industry-wide consensus on power limits and related issues would form the strongest possible foundation for Commission action in this proceeding. The space station and earth station operators participating in the working group formed by SIA are experts regarding the multiple factors that affect the interference environment for satellite networks. By taking advantage of their combined skills and experience, the working group will be able to provide a comprehensive analysis of the technical issues presented in the *Notice*.

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<sup>1</sup> *See, e.g.,* PanAmSat Comments at 3, 5.

Accordingly, GE Americom urges the Commission to consider the recommendations of the industry working group convened by SIA before taking further action to revise the technical standards for earth station licensing.

Respectfully submitted,

GE AMERICAN COMMUNICATIONS, INC.

Mark R. O'Leary  
Senior Vice President and  
General Counsel  
GE American Communications, Inc.  
Four Research Way  
Princeton, NJ 08540

By: /s/ Karis A. Hastings  
Peter A. Rohrbach  
Karis A. Hastings  
Hogan & Hartson L.L.P.  
555 Thirteenth Street, N.W.  
Washington, D.C. 20004  
(202) 637-5600

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